

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
vs.)
)
)
TOU THAO,)
)
)
Defendant.)

LIST OF SELECTED EXHIBITS

Below is a list of exhibits that were admitted in the above-captioned case in the Government's case-in-chief. With respect to the following list, the parties request a limiting instruction for the jury.¹ Specifically, we respectfully request that the Court read the following stipulated limiting instruction with respect to the following exhibits:

In considering the following training evidence, I instruct you that you may only consider the training evidence as to the particular defendant (or defendants) who received that training, and not as to any other defendant.

1. Government Exhibit 53: FTO Training Handbook
2. Government Exhibit 66: Kueng Policies and Procedures Certification

02/07/2019

¹ Mr. Thao's position is that should he have been tried alone, the following list would not be admissible on relevance grounds and thus would not be within the purview of the jury. In addition to the list laid out here, Mr. Thao's position is that Government Exhibits 54, 64, 65, 69, and 70 would not be admissible should he been tried singularly. The Government disagrees with that position.

3. Government Exhibit 67: Kueng Policies and Procedures Certification 11/26/107
4. Government Exhibit 68: Kueng Workforce Training
5. Government Exhibit 71: Lane Policies and Procedures Certification 02/07/2019
6. Government Exhibit 72: Lane Workforce Training
7. Government Exhibit 73: Lane/Kueng Academy Use of Force PowerPoint
8. Government Exhibit 74: Lane/Kueng Academy Defensive Tactics Lesson Plans
9. Government Exhibit 77: Kueng Academy Testing Selections
10. Government Exhibit 78: Lane Academy Testing Selections
11. Government Exhibit 80: Lane/Kueng EMR Sign-in Sheet – MPD Academy
12. Government Exhibit 81: Emergency Medical Responder Textbook
13. Government Exhibit 82: EMR Training PowerPoint Selections
14. Government Exhibit 83: EMR Book Selections
15. Government Exhibit 84: Lane EMR, CPR Enrollment and Assessment Materials
16. Government Exhibit 85: Kueng EMR, CPR Enrollment and Assessment Materials
17. Government Exhibit 92: Lane Henn. Co. Juvenile Det. Ctr. Offer Letter and New employee orientation
18. Government Exhibit 93: Lane Henne Co. Juvenile Det. Ctr. Resignation letter
19. Government Exhibit 94: Lane Henn. Co. Juvenile Det. Ctr. Field Training Emergency Response Selections

20. Government Exhibit 95: Lane Henn. Co. Juvenile Det. Ctr. Training Log
(spreadsheet)

21. Government Exhibit 96: Lane Henn. Co. Juvenile Dtr. Ctr. Positional Asphyxia
Training 2017 & 2018

22. Government Exhibit 103: Kueng Henn. Tech Transcript

23. Government Exhibit 104: Lane Henn. Tech Transcript

Dated: February 15, 2022

Respectfully Submitted,

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